

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

MOHAMAD HAMAD

Magistrate's No. 24-1794

GOVERNMENT'S PROPOSED MODIFICATION
TO CONDITIONS OF PRETRIAL RELEASE

AND NOW, comes the United States of America, by its attorneys, Eric G. Olshan, United States Attorney for the Western District of Pennsylvania, and Carolyn J. Bloch, Assistant United States Attorney for said district, and submits the following Government's Proposed Modification to Conditions of Pretrial Release as follows:

1. On November 5, 2024, defendant filed a Motion to Hold an Evidentiary Hearing to Amend Conditions of Pretrial Release. Doc. No. 28.
2. On November 6, 2024, the Honorable United States Magistrate Judge Kezia O. L. Taylor, in connection with the scheduled Preliminary Hearing, conducted an evidentiary hearing and considered defendant's requests for modification of the conditions of release previously imposed. At the conclusion of the hearing, the Court ordered the government to file proposed revised language as to condition 7(u) of the Additional Conditions of Release. *See* Order Setting Conditions of Release issued on October 30, 2024. Doc. No. 17.

3. The government proposes the following language:

The defendant shall not possess, view, access, or otherwise use material that reflects extremist or terroristic views without the permission of the assigned probation officer. Extremist or terroristic material includes, but is not limited to websites, videos, magazines, articles, books, writings, photographs, pictures, and graphics produced by or in support of any Foreign Terrorist Organization (FTO), as designated under 8 U.S.C. § 1189, including HAMAS, or that supports the use of violence to intimidate or coerce a civilian population or a government. *See* state.gov/foreign-terrorist-organizations/. The defendant shall furthermore not use any platform that offers encrypted communications, including but not limited to Signal, Telegram, WhatsApp, and Gabb.

4. Government counsel provided the above proposed revised language to counsel for the defendant. Ms. Olaiya has advised that she objects, at least in part, to the proposed language.

Respectfully submitted,

ERIC G. OLSHAN
United States Attorney

By: /s/ Carolyn J. Bloch
CAROLYN J. BLOCH
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